

CONSTANTINE CANNON LLP

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June 8, 2020

So Ordered,

The Honorable Allyne R. Ross
United States District Judge
Eastern District of New York
225 Cadman Plaza East, Room 918
Brooklyn, New York 11201

/s/(ARR)

Allyne R. Ross, U.S.D.J.
6/8/20

Re: *United States v. Vincent Asaro*
Criminal Docket No. 17-127 (S-1) (ARR)

Dear Judge Ross:

We write on behalf of Vincent Asaro to seek the Court's permission to allow Mr. Asaro to relocate to his daughter Noreen Asaro's residence for the remainder of his home incarceration, because his daughter's home is better set up to accommodate his physical disabilities than his fiancé's home.

On April 17, 2020, Your Honor granted Mr. Asaro's motion for compassionate release and placed him on supervised release with home incarceration for a period of 23 months. Since being released from MCFP Springfield, Mr. Asaro has resided at his fiancé Michele Carollo's residence and complied with all terms of release.

Unfortunately, Mr. Asaro's family has come to realize that Ms. Carollo's house is not ideal for Mr. Asaro due to his medical condition. Mr. Asaro's bedroom is on the second floor, and he has great difficulty walking up and down the stairs. This past week, he fell twice on the stairs and had to go to the hospital for x-rays. Due to these difficulties, Mr. Asaro's family respectfully asks the Court to allow Mr. Asaro to serve his remaining time of home incarceration at his daughter's residence. Ms. Asaro lives approximately 20 minutes from Ms. Carollo's house, and a few blocks away from Mr. Asaro's grandchildren. Moreover, Ms. Asaro's home is a three-bedroom one level ranch-style residence. The Probation Department has inspected and approved Ms. Asaro's home, and agrees it is a safer option for Mr. Asaro.

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If allowed to move to Ms. Asaro's home, Mr. Asaro will continue to comply with all terms of supervised release and home incarceration.

Respectfully submitted,

By: /s/
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Deirdre von Dornum
Attorney-in-Charge
Federal Defenders EDNY

cc: Clerk of Court (ARR) (by ECF and Email)
Assistant U.S. Attorneys (by ECF and Email)
Senior U.S. Probation Officer Steven Sanford (by Email)